BACHNER & ASSOCIATES, P.C.

ATTORNEYS AT LAW
111 BROADWAY
SUITE 701
NEW YORK, NEW YORK 10006

TELEPHONE: (212) 344-7778 FACSIMILE: (212) 344-7774

www.bhlawfirm.com

MICHAEL F. BACHNER*
*ALSO ADMITTED IN NJ

NEW JERSEY OFFICE 18 METZGER DRIVE WEST ORANGE, NJ 07052

December 28, 2023

VIA ECF

Hon. Lewis J. Liman US District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007-1312 REQUEST GRANTED.

12/29/2023 so ordered.

LEWÍS J. LIMAN United States District Judge

Re: U.S. v. Caruso (John Nolan), 23 Cr. 654 (LJL)

Dear Judge Liman:

My office represents John Nolan. I write with the consent of the prosecution to respectfully request an extension from today, December 28, 2023 until January 3, 2024 to obtain a third signature for Mr. Nolan's bond. Mr. Nolan was released at presentment on a \$1,000,000 bond secured by his own signature. The signatures of three additional financially responsible persons were to be secured by today. (Dkt Entry #7) Two persons have signed the bond. A third FRP was okayed today by the government. However, after reviewing bond, the proposed signer just asked my office for a few more days to consult with his own counsel regarding his obligations under the bond.

Should the Court have any questions, we stand ready to assist. Thank you for your courtesy in this and all other matters.

Respectfully,

/s/Michael Bachner
Michael F. Bachner

Cc: Government counsel Pre-trial Services